

III. REMARKS

Claims 1, 3-4, 6-7 and 9-11 are not unpatentable over Carter in view of Fleischman under 35 U.S.C. §103(a).

The combination of Carter and Fleischman does not disclose or suggest displaying a resized representation of a web page on a "handheld" device as is claimed by Applicant. Additionally, the combination of Carter and Fleischman does not disclose or suggest deriving the "resized representation of the Web page" as is claimed by Applicant.

Carter generally relates to a file system, a Web server, and object repository system, or any other structured storage that maintains an organized set of data. (Col. 5, lines 4-7).

Also, Carter relates to a "network system 10" and not a "handheld" device as is claimed by Applicant. One example of the system of Carter is shown with respect to FIG. 7. As shown in FIG. 7, each node 212a-212c connects via a "shared memory subsystem 222". This shared memory 222 is a "virtual shared memory" that is accessible by each of the nodes 212a-212c via the shared memory subsystem 222. Carter does not make any disclosure or suggestion that this system is to be implemented in a "hand held" device, as is claimed by Applicant. Col. 20, Lines 1-17, cited by the Examiner, only relates to a computer network 210 with nodes 212a-212c with a shared memory system 220. Thus, at least this feature of Applicant's invention is not disclosed or suggested by Carter.

Fleischman discloses an apparatus for scaling an "image". Fleischman does not disclose or suggest displaying the resized representation of a "web page" as is claimed by Applicant.

Fleischman only relates to resizing an "image", not the whole web page as displayed. Fleischman discloses an "arrangement of pixels of an image to be scaled." (Col.2, lines 46-48). The manipulated arrangement of pixels correspond to a scaled representation of the IM [image signal] signal. (Col. 2, lines 60-62). (see also Col. 2, line 63 to Col. 3, line 10).

The input in Fleischman is an "image", whereas in Applicant's invention that input is a "web page" that is loaded into virtual memory. Fleischman scales a monochromatic image signal (IM). (Col. 2, lines 29-35).

Also, the output of Fleischman is an "image" and not a "web page" as in Applicant's invention. (See e.g. Col. 3, lines 7-10; Col. 10, lines 39-49).

Thus, since Carter does not disclose or suggest implementation in a "handheld" device as claimed by Applicant, and Fleischman only discloses resizing an "image" and not a web page, the combination of Carter and Fleischman does not disclose or suggest each feature of Applicant's invention as claimed.

Additionally, Carter does not disclose or suggest loading the web page into the virtual memory for deriving the "resized representation of the web page" as claimed by Applicant. Carter only discloses providing distributed control for structured storage systems, that store, share, and deliver web pages to requested nodes. (Col. 3, lines 11-14).

The Examiner states that Carter, Col. 21, lines 10-17, discloses the feature "displaying the web page from the display memory." However, all that Carter teaches here is a "computer network 230" that has a distributed shared memory. Nothing here discloses

displaying the "resized representation" of a "web page" as claimed by Applicant.

Furthermore, as previously noted by Applicant, in resizing a web page, the functional representation of the web page as well as the pixel image is resized. This is not disclosed or suggested by Carter and Fleischman.

The Examiner alleges that the claim limitations do not exclude the case when the Web page is just a pixel image without functional attachment. To be exact, if a web page comprises e.g. only a single image, it seems - based on the end-user point of view - that the page does not comprise anything else. The HTML code causing the browser to display the image, however, comprises a lot of things. An example of "a single image web page" is disclosed below.

```
<!DOCTYPE html PUBLIC "-//W3C//DTD XHTML 1.0 Transitional//EN
http://www.w3.org/TR/xhtml1/DTD/xhtml1-transitional.dtd >
<html>
.....
</head>
.....
<table leftmargin="0" topmargin="0" marginwidth="0" marginheight="0">
<tr border="0" cellpadding="3" cellspacing="0">
    <td bgcolor="#002032" valign="middle">
        .....
        ... 
        ...

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Thus, it is respectfully submitted that, the Examiner's argument is not valid.

Also, Examiner comments that the claim limitations do not address how the functional representation of the web page as well as the pixel image is resized. It is noted that claim 1 recites that a "web page" is loaded in a virtual memory for deriving a resized

representation of the "web page." Since the remaining horizontal and vertical pixels are stored in a display memory, the web page in the vertical memory is also in the form of the pixels. In this case, these pixels do not correspond to a single image, but rather to a "web page" to be displayed. Thus, the claim limitations do address how this is done.

Therefore, the claim limitations of Applicant's invention are not disclosed or suggested by Carter and Fleischman.

It is also submitted that there is no motivation to combine Carter and Fleischman as required for purposes of 35 U.S.C. §103(a). In order to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine reference teachings. There must also be a reasonable expectation of success, and the reference(s), when combined, must teach or suggest all of the claim limitations. (See M.P.E.P. §2142).

As previously noted, Carter relates to structural storage in a system that is not intended to be used in a "handheld" device as is claimed by Applicant. Fleischman only relates to resizing "images", not "web-pages" as claimed by Applicant.

In order to combine references for purposes of 35 U.S.C. §103(a), the references themselves and/or the knowledge generally available to one of skill in the art must provide the requisite motivation or suggestion to modify the references as proposed for purposes of 35 U.S.C. §103(a), and the Examiner must be able to identify where in the reference such motivation or suggestion can be found. When "the PTO asserts that there is an explicit or

implicit teaching or suggestion in the prior art, it must indicate where such a teaching or suggestion appears in the reference". In re Rijckaert, 28 USPQ2D 1955, 1957 (Fed. Cir. 1993).

A person of skill in the art would not be motivated to combine Carter and Fleischman because:

Carter does not disclose a solution which is meant to be implemented in a hand-held device. The virtual memory in Carter is a shared virtual memory. The input in Fleischman is an image whereas in the invention the input is a web page that is loaded into a virtual memory. The output in Fleischman is a scaled image whereas in the invention the output is a resized representation of the web page.

Thus, Carter and Fleischman only disclose resizing "images", not the whole web page as displayed. Also, the output in Fleischman is an "image" not a "web page" as in Applicant's invention.

Therefore, neither Carter nor Fleischman provides the requisite suggestion or motivation to modify the references as proposed by the Examiner and the Examiner's proposition that Applicant's invention would be obvious as recited in the claims is not supported by the factual content of Carter and Fleischman.

Thus, claims 1, 3-4, 6-7 and 9-11 are patentable over Carter in view of Fleischman.

With respect to claim 7, the Examiner states that Carter discloses a "hand held device comprising a browser." This is respectfully traversed. Applicant submits that Carter does not relate to, disclose or suggest a "hand held" device as claimed by Applicant.

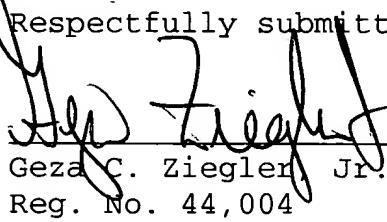
2. Claims 2 and 8 are not unpatentable over Carter in view of Fleischman and further in view of Bjork, at least by reason of their respective dependencies.

3. Claim 5 is not unpatentable over Carter in view of Fleischman and further in view of Haas, under 35 U.S.C. §103(a), at least by reason of its dependency.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment of any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


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